

EXHIBIT 44

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

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COALITION FOR TJ, :
Plaintiff, :
v. : Civil Action No.:
FAIRFAX COUNTY SCHOOL : 1:21-cv-00296-CMH-JFA
BOARD, :
Defendant. :

-----x
Deposition of Coalition for TJ
By and through its Designee
ASRA NOMANI
McLean, Virginia
Monday, October 18, 2021
9:02 a.m.

Job No.: 404859

Pages: 1 - 207

Reported by: Judith E. Bellinger, RPR, CRR

1 Deposition of ASRA NOMANI, held at the
2 offices of:

3
4 HUNTON ANDREWS KURTH LLP

5 8405 Greensboro Drive

6 Suite 140

7 McLean, VA 22102

8 703.714.7400
9
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12
13

14 Pursuant to notice, before Judith E.
15 Bellinger, Registered Professional Reporter,
16 Certified Realtime Reporter, and Notary Public in
17 and for the Commonwealth of Virginia.
18
19
20
21
22

A P P E A R A N C E S

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C O N T E N T S

EXAMINATION OF ASRA NOMANI

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By Mr. Roper

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By Ms. Rewari

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E X H I B I T S

(Attached to the transcript)

Coalition

Exhibits:

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Exhibit 1 Defendant's Notice of Deposition for
Plaintiff

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Exhibit 2 Declaration of Asra Q. Nomani

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Exhibit 3 Coalition for TJ Core Team document

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Exhibit 4 Official Coalition for TJ web page

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Exhibit 5 Email from Coalition for TJ to

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undisclosed recipients, September 6,
2020

Exhibit 6 Coalition for TJ letter "Dear Friend
of Coalition for TJ"

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Exhibit 7 Email from Glenn gmail to various
recipients, November 16, 2020

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Exhibit 8 To Whom It May Concern letter,
December 2, 2020

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1 built out of common sense.

2 Q And who determines whether the group
3 has reached a point of consensus to do something?

4 A It's really a decision that is made
5 collectively. I mean, you could -- you could
6 argue that the consensus means that everybody is
7 on board with that decision because we have come
8 to a compromise that everybody is agreeable with.
9 So, you know, I won't say that it's unanimous,
10 because there's not a vote that is taken, so I
11 couldn't, you know, assign unanimity to it.

12 It's something that we make sure that,
13 you know, everybody is comfortable with the
14 decision.

15 Q Have there been any decisions made by
16 the coalition where you took a vote?

17 A I really can't recall any that we took
18 a vote.

19 Q Okay.

20 (Coalition Exhibit 3 marked for
21 identification and attached to the transcript.)

22 Q The court reporter's just handed you a

1 document that was marked as Exhibit 3.

2 Do you recognize this document?

3 A I do recognize the document.

4 Q What is it?

5 A So the document is a -- I'm trying to
6 think of what to call it. It's an organizational
7 document in which we identified the different jobs
8 for which our main group of volunteers were
9 volunteering.

10 So what we -- like I said before, we
11 are busy parents and so I was just hesitating in
12 describing this because I was about to call it a
13 cheat sheet of sorts because it's, basically, the
14 way that we can remember, what did we sign up to
15 do?

16 Q When was this document created?

17 A This would have been created early. I
18 don't know exactly when it was created. But
19 probably around September 2020, when we were
20 emerging in the community with more activities and
21 we were getting busier and busier.

22 Q Has this structure of the core team of

1 TJ -- or Coalition for TJ, has the structure
2 that's in this document changed, at any point,
3 since September 2020?

4 A The structure has remained the same
5 since September 2020 for this, committees or teams
6 that we've created for Coalition for TJ.

7 Q Now, at the top, it says "Coalition for
8 TJ core team."

9 A Yeah.

10 Q What do you mean by "core team"?

11 A So it's redundant, but you will see,
12 lower, that there's identification of different
13 members who are in the core team and, then,
14 there's different subgroups within that sub-team.

15 Q So is everyone who is listed as a
16 member of the core team one of the people that's
17 in these other sub-teams that are identified here?

18 MR. ROPER: Objection to form.

19 MS. REWARI: Yeah, that was a bad
20 question. Let me try again.

21 Q So the first paragraph says "The
22 Coalition for TJ is organized into a core team

1 the coalition that they spoke to?

2 A They spoke to me. They spoke to Glenn,
3 Suparna Dutta.

4 Q Have the criteria for membership in the
5 coalition ever changed during its time of its
6 existence?

7 A No, the criteria for membership has
8 never changed in Coalition for TJ.

9 Q Is the membership of the coalition
10 limited to people from particular racial groups?

11 A Membership is absolutely not limited to
12 people from particular racial groups in Coalition
13 for TJ.

14 Q Okay. So are there any Hispanic
15 members of the Coalition for TJ?

16 A We -- I believe we do have Hispanic
17 members in Coalition for TJ.

18 Q I think you mentioned previously that
19 Mr. Jackson is black; is that right?

20 A I don't know if I mentioned that. But
21 Mr. Jackson is black.

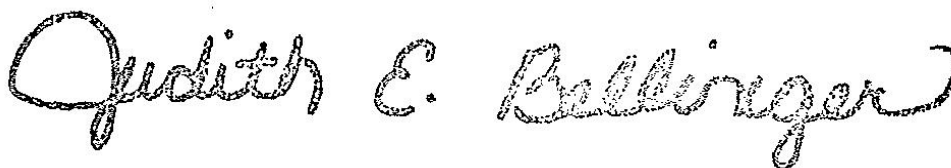
22 Q Okay. And so, are there black members

1 CERTIFICATE OF REPORTER - NOTARY PUBLIC

2 I, JUDITH E. BELLINGER, RPR, CRR, the
3 officer before whom the foregoing deposition was
4 taken, do hereby certify that the foregoing
5 transcript is a true and correct record of the
6 testimony given; that said testimony was taken by
7 me and thereafter reduced to typewriting under my
8 direction; that reading and signing was not
9 requested; and that I am neither counsel for,
10 related to, nor employed by any of the parties to
11 this case and have no interest, financial or
12 otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set
14 my hand and affixed my notarial seal this 5th day
15 of November, 2021.

16 My Commission Expires: September 30, 2024
17

18
19 
20

21 NOTARY PUBLIC IN AND FOR
22 THE COMMONWEALTH OF VIRGINIA

Re: Deposition of **Asra Nomani, Designee**

Date: 10/18/2021

Case: Coalition for TJ -v- Fairfax County School Board

Return to: transcripts@planetdepos.com

[illegible]

_____Dec. 6, 2021_____

(Date)

Asra Nomani

(Signature)